

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,)
v.)
Plaintiff,)
SUBURBAN HEIGHTS LLC,)
CRESTLINE PROPERTY LLC,)
TRILINE PROPERTIES LLC, and)
JINGLE PROPERTIES LLC,)
Defendants.)
Case No. 4:24-cv-01319-SEP

JOINT STIPULATION OF DISMISSAL

Plaintiff, United States of America, and Defendants Crestline Property LLC, Triline Properties LLC, and Jingle Properties LLC hereby jointly stipulate to the dismissal of this case with respect to those three defendants with prejudice, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).¹

“In ordinary civil cases, a notice of dismissal that complies with [Rule 41(a)(1)] operates as a matter of right upon notice to the court, and permission of the court is not required.”

Williams v. Clarke, 82 F.3d 270, 272 (8th Cir. 1996). Rule 41(a)(1)(A)(ii) provides that a plaintiff may dismiss an action without a court order by filing a stipulation of dismissal signed by all

All parties that have appeared in this matter — Plaintiff, United States of America, and Defendants Crestline Property LLC, Triline Properties LLC, and Jingle Properties LLC —

¹ The fourth defendant, Suburban Heights LLC, did not file an answer in this case. See Clerk's Entry of Default against Defendant Suburban Heights LLC, ECF No. 26 (Jan. 28, 2025). The United States is separately filing a Notice of Voluntary Dismissal under Fed. R. Civ. P. 41(a)(1)(A)(i) to dismiss claims against that defendant.

stipulate to dismissal. The entry of a stipulation of dismissal under Rule 41(a)(1)(A)(ii) “is effective automatically and does not require judicial approval.” *Gardiner v. A.H. Robins Co., Inc.* 747 F.2d 1180, 1189 (8th Cir. 1984).

Dated: April 14, 2025

Respectfully submitted,

For Plaintiff:

SAYLER A. FLEMING
United States Attorney
Eastern District of Missouri

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

MICHAEL E. GATES
Deputy Assistant Attorney General
Civil Rights Division

/s/ Regan Hildebrand
REGAN HILDEBRAND
Bar No. 6326374 (IL)
Bar No. 57438 (MO)
Assistant U.S. Attorney
Civil Rights Coordinator
United States Attorney’s Office
Eastern District of Missouri
Thomas F. Eagleton U.S. Courthouse
111 South Tenth St., 20th Fl.
Saint Louis, MO 63102
Phone: (314) 539-7703
Fax: (314) 539-2287
regan.hildebrand@usdoj.gov

/s/ Carrie Pagnucco
CARRIE PAGNUCCO
Attorney Reg. No. 4774790 (NY)
Chief
MEGAN K. WHYTE DE VASQUEZ
Deputy Chief
Housing and Civil Enforcement Section
Civil Rights Division
U.S. Department of Justice
4 Constitution Square
150 M Street NE
Washington, DC 20530
Phone: (202) 514-4713
Fax: (202) 514-1116

For Defendants Crestline Property LLC, Triline Properties LLC, and Jingle Properties LLC:

/s/ Justin K. Gelfand
WILLIAM S. MARGULIS, #37625
JUSTIN K. GELFAND, #62265
GREGORY P. BAILEY #97822MD
7700 Bonhomme Ave., Ste. 750
St. Louis, MO 63105

Telephone: 314.390.0234
Facsimile: 314.485.2264
bill@margulisgelfand.com
justin@margulisgelfand.com
greg@margulisgelfand.com

CERTIFICATE OF SERVICE

I certify that I served the foregoing document to all attorneys of record via the Court's CM/ECF electronic notification system on April 14, 2025.

Additionally, the document was served on April 14, 2025, to the following via first class mail and email (courtesy copy):

Suburban Heights LLC
c/o Lester Stuckmeyer, registered agent
Martin, Leyhe, Stuckmeyer and Associates LLC
105 Concord Plaza, Suite 209
St. Louis, MO 63128
Lester@mlslawmo.com

/s/ Regan Hildebrand

REGAN HILDEBRAND

Assistant United States Attorney